

**ORIGINAL** FILED IN OPEN COURT  
U.S.D.C. - Atlanta

**NOV 19 2018**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

By:  Clerk  
Deputy Clerk

UNITED STATES OF AMERICA

*v.*

MITCHELL DUNAHOO

Criminal Indictment

No. **1 1 8 - C R - 4 5 4**

THE GRAND JURY CHARGES THAT:

**Count One**

Between in or about October 2016, and continuing through in or about August 2017, in the Northern District of Georgia, the defendant, MITCHELL DUNAHOO, with the intent to harass and intimidate, used the mail, any interactive computer service, electronic communications service, and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause, substantial emotional distress to Victim 1, all in violation of Title 18, United States Code, Section 2261A(2)(B).

**Count Two**

Between in or about October 2016, and continuing through in or about August 2017, in the Northern District of Georgia, the defendant, MITCHELL DUNAHOO, made repeated telephone calls and repeatedly initiated communication with a telecommunications device in interstate communications, during which communication ensued, solely to harass a specific person receiving

those communications, in violation of Title 47, United States Code, Section 223(a)(1)(E).

A True BILL  
ANN NORDE  
FOREPERSON

BYUNG J. PAK  
*United States Attorney*

JILL E. STEINBERG  
*Assistant United States Attorney*  
Georgia Bar No. 502042

600 U.S. Courthouse  
75 Ted Turner Drive SW  
Atlanta, Georgia 30303  
404-581-6000; Fax: 404-581-6181